I have been flying tours on the Big Island since 1998 under SFAR environment. Flying tours is not easy task. We have to make sure passengers are comfortable and above all we have to make sure a safety of Passengers. However because of SFAR, which put us into more streess and unsafe situations.

Here are some of the examples:

1) Congestion

Since we have 1500 ft altitude limitation that will put us up to fix wing traffic altitude.

It is already congested with helicopter traffics at certain location but since helicopters

are pushed up to $1500~{\rm ft}$ so now it get even worse. We have helicopter and fix wing traffic

flying same altitude. Which could cause midair.

I used tought how to fly the helicopters as a CFI. Helicopters usually stay $500 \mathrm{ft}$ and $1000 \mathrm{ft}$

for fix wing in traffic pattern so we can have vertical separation. (So at least CFI did not have to warry $\frac{1}{2}$

to much about fix wing flow.) Flying the tours in Hawaii with 1500ft, sharing same airpace with

fix wing is really unsafe and put more workloads to all pilots, both helicopter and fix wing pilots.

(We are not only dealing with slow C172, there are some fast-moving twins, too.) I have heard

close calls for mid-air between helicopter and fix-wing quite bit.

2) Altitude

I really can not under stand why the helicopters in Hawaii have to fly high altitude even we have

great forced landing spots (Cane field, Ranch, Forest, flat lava field, and etc.). Over those area,

most of the case we do not have to even warry about the noise issue, but still have to fly high.

3) Raw terrain distance

With Hawaii's strong trade wind days, there is stuations that pilots want to avoid flying middle of

the valley to stay away from rough air. Some times it is much smoother and much safer flying

along the sides of valley, but we loose those great options because of SFAR.

There are some good thing about SFAR, too. For example, "Helicopter Floatation Equipmet" (Section 3)

which we learned from the accident and improved the safety. "Helicopter Operating Limitations"

(Section 5) is another good thing, even though this is a commonsence for the helicopter pilots.

As a one of tour helicopter pilot from Hawaii who want to continue to fly safely tour, I ${\tt KNOW}$

"IT is the time to make a better and safer SFAR"